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UNITED STATES DISTRICT COURT
DISTRICT OF THE STATE OF CALIFORNIA
CENTRAL DISTRICT, WESTERN DIVISION

AROGANT HOLLYWOOD,
ALISON HELEN FAIRCHILD,

Plaintiff(s),

vs.

PUBLIC STORAGE, INC., PUBLIC
STORAGE PROPERTIES XV, INC., PS
ORANGE CO HOLDINGS, INC.,
BRADLEY WAYNE HUGHES JR.,
DOES 1-10,

Defendant(s),

} Case No. 5:18-cv-01822-JGB-GJS

} USDJ: Honorable Jesus G. Bernal
Ctrm: 3470 Twelfth St., Courtroom 1
} USMJ: Honorable Gail J. Standish
Ctrm: 255 East Temple St., 640, 6th Floor

} Date of Hearing: September 5, 2018

**MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY
INJUNCTION**

Pursuant to Fed. R. Civ. P. 65 and L.R. 65-1, Plaintiffs Arogant Hollywood and Alison Helen Fairchild hereby move this Court to issue a Temporary Restraining Order and Preliminary Injunction restraining Defendants from illegally auctioning Plaintiffs' personal property in violation of the laws of the United States and the state of California.

Plaintiffs seek an order compelling Defendants to show cause why this TRO and Preliminary Injunction should not be granted. An order compelling Defendants to stop violating Plaintiffs' constitutional rights under Title II of the Civil Rights Act of 1964 and Title III of the American Disabilities Act of 1990. In support of this motion, Plaintiffs' rely upon the attached memorandum of points and authorities.¹

A proposed order is attached.

ORAL ARGUMENT REQUESTED

Respectfully submitted,

By: 
Arogant Hollywood, Plaintiff in Pro-Se Litigation
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¹ Pursuant to L.R. 65-1(a), Plaintiffs' memorandum includes the declaration of Arogant Hollywood. The Hollywood Declaration states that, prior to the filing of this motion, Arogant Hollywood provided Defendants actual notice of the filing, including copies of all pleadings and papers. Defendants refused to accept ex parte application notice. See Hollywood Declaration at ¶¶

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CERTIFICATE OF SERVICE

I certify that on September 2, 2018, I served one copy of the foregoing *Plaintiffs' Application for TRO & Preliminary Injunction, Appendix of Exhibits in Support of TRO, Proposed Order, Declaration RE Notice*, and any and all attachments, by CM/ECF and by electronic mail (.pdf format) on the following:

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19 **I declare under the penalty of perjury under the laws of the state of California and**
20 **federal laws of the United States constitution that the above documents were**
21 **electronically served on Defendants' attorneys**

22 By: Arogant Hollywood
23 Arogant Hollywood, Plaintiff in Pro-Se Litigation
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**UNITED STATES DISTRICT COURT
DISTRICT OF THE STATE OF CALIFORNIA
CENTRAL DISTRICT, WESTERN DIVISION**

AROGANT HOLLYWOOD, ALISON HELEN FAIRCHILD

Case No. 2:18-CV-02098-JGB(GJS)

USDJ: Honorable Jesus G. Bernal
Ctrm: 3470 Twelfth St., Courtroom 1
USMJ: Honorable Gail J. Standish
Ctrm: 255 East Temple St., 640, 6th Floor

VS.

PUBLIC STORAGE, INC., PUBLIC
STORAGE PROPERTIES XV, INC., PS
ORANGE CO HOLDINGS, INC.,
BRADLEY WAYNE HUGHES JR.,
DOES 1-10,

Defendant(s),

**MEMORANDUM OF POINTS & AUTHORITIES IN SUPPORT OF PLAINTIFFS'
MOTION FOR TEMPORARY RESTRAINING ORDER, OSC AND PRELIMINARY
INJUNCTION**

Plaintiffs Arogant Hollywood and Alison Helen Fairchild submit the following memorandum of points and authorities in support of Plaintiffs' motion for a temporary restraining order and preliminary injunction.²

² Pursuant to L.R. 65-1, prior to filing this motion, Plaintiff Arogant Hollywood provided Defendants actual notice of the of this ex parte application.

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APPLICATION FOR TEMPORARY RESTRAINING ORDER

Plaintiffs Arogant Hollywood and Alison Helen Fairchild hereby petition this Court for a temporary restraining order and preliminary injunction restraining Defendants Public Storage, Inc., Public Storage Properties XV, Inc., PS Orangeco Holdings, Inc., and Bradley Wayne Hughes Jr. (**hereinafter collectively “Defendants”**), their agents, servants, employees, property managers, district managers and regional managers from illegally disposing of Plaintiffs’ personal property without first obtaining a court order from state superior court, as Plaintiffs have submitted a declaration in opposition to lien sale several times over the past month, and Defendants have chosen to ignore Plaintiffs’ declaration in opposition to lien sale.

Plaintiffs are petitioning this Court for an order compelling Defendants to show cause why a preliminary injunction should not be granted enjoining Defendants [and its agents, servants, and employees] from committing or performing the above described acts during the pendency of this action.

This ex-parte application for TRO preliminary injunction is made on the grounds that based on the filed civil rights complaint Plaintiffs are entitled to the relief requested, and this relief consists of restraining the Defendants and its agents from the commission or continuance of the acts complained of, either for a limited period of time or perpetually.

This ex-parte application for a temporary restraining order is made on the grounds that the declaration of Arogant Hollywood and Alison Helen Fairchild show evidence that Plaintiffs would clearly suffer great irreparable harm if the said Defendants, and its agents are not enjoined to cease their illegal, unconstitutional, evil and deliberate acts that are causing a substantial amount of emotional distress to both Plaintiffs, and specifically Plaintiff Fairchild. This ex-parte application is made on the grounds that several allegations alleged throughout Plaintiffs’ civil rights complaint provide information that both Plaintiffs would suffer irreparable harm if their temporary restraining order request was not granted.

This ex-parte application is made on the grounds that great irreparable harm and emotional injury will result to both Plaintiffs before the matter can be heard on proper notice

1 as Defendants have already made plans to illegally sale and/or dispose of Plaintiffs' personal
2 property on September 7, 2018. [Exhibit 2]

3

4 **PLAINTIFFS AROGANT HOLLYWOOD AND ALISON HELEN FAIRCHILD**
5 **HEREBY ALLEGE:**

6 (1.) Plaintiff **AROGANT HOLLYWOOD** is and has been a resident of Ontario,
7 California at all relevant times stated throughout this ex-parte application. Plaintiff
8 Hollywood is a non-tenant owner of personal property located at 5548 Arrow Highway,
9 Space # 279, Montclair, CA 91764. Plaintiff Hollywood is a tenant owner of personal
10 property located at 5548 Arrow Highway, Space # 287, Montclair, CA 91764.

11

12 (2.) Plaintiff **ALISON HELEN FAIRCHILD** is and has been a resident of Ontario,
13 California at all relevant times stated throughout this ex-parte application. Plaintiff Fairchild
14 is a non-tenant owner of personal property located at 5548 Arrow Highway, Space # 279,
15 Montclair, CA 91764.

16 Plaintiff Fairchild is a non-tenant owner of personal property located at 5548 Arrow
17 Highway, Space # 287, Montclair, CA 91764.

18

19 (3.) Defendants Public Storage, Inc., and PS Orangeco Holdings, Inc. are incorporated
20 California businesses that operate in the city of Glendale, California.

21 (4.) Defendant Public Storage Properties, Inc. XV, is a merged-out California corporation.

22

23 (5.) Defendant Bradley Wayne Hughes Jr. is an individual over the age of 18 years-old
24 and a major shareholder of Defendants Public Storage, Inc., PS Orangeco Holdings, Inc., and
25 Public Storage Properties XV, Inc.

1 (6.) On June 27, 2018 Defendants were granted a TRO, and since June 27, 2018 Plaintiff
2 Hollywood has been unable to retrieve property and/or bring new personal property into his
3 two self-storage units.

4
5 (7.) On June 16, 2018 Defendants requested that city of Montclair police department
6 peace officers physically remove Plaintiffs Arogant Hollywood and Alison Helen Fairchild
7 from 5548 Arrow Highway, Montclair, CA 91764.

8
9 (8.) On June 21, 2018 Defendants deactivated Plaintiffs' gate access code to enter 5548
10 Arrow Highway, Montclair, CA 91764, Spaces # 279 and # 287.

11
12 (9.) On June 21, 2018 Defendants overlocked Plaintiffs' two self-storage units, Spaces #
13 279 and # 287 by cutting off one of Plaintiffs' locks for each unit and replacing it with one
14 of their red colored locking mechanisms reserved for those Public Storage tenants in default
15 of their rent.

16
17 (10.) On June 27, 2018 Defendants were granted a TRO, and since June 27, 2018 Plaintiff
18 Fairchild has been unable to retrieve property and/or bring new personal property into her
19 two self-storage units because Plaintiff is disabled and unable to open her self-storage units
20 without the assistance of Plaintiff Hollywood.

21
22 (11.) In early July 2018 Defendants began blocking Plaintiffs' ability to pay for their two
23 self-storage units online at: publicstorage.com

24
25 (12.) In early August 2018 Defendants listed Plaintiffs' personal property on
26 publicstorageauctions.com

1 (13.) Defendants have planned and conspired to unlawfully and illegal enter Plaintiffs' two
2 self-storage units on September 7, 2018 and illegally sale Plaintiffs' personal property to the
3 highest bidder, disposing of all Plaintiffs' personal property valued at over \$ 20,000.

4
5 (14.) As of August 30, 2018, Defendants have ignored Plaintiffs' declaration in opposition
6 to lien sale, and deliberately failed to initiate a state court unlawful detainer action or small
7 claims action in San Bernardino County, Fontana Superior Court, the state court that as
8 jurisdiction over city of Montclair eviction and small claims lawsuits.

9
10 (15.) Plaintiff Arogant Hollywood has had a tremendous amount of distress ever since he
11 learned that his personal property would be disposed of by Defendants on September 7,
12 2018.

13
14 (16.) Plaintiff Alison Helen Fairchild has had a tremendous amount of distress, anxiety,
15 depression, a complete disruption of her life, heart palpitations, tightness in her chest, panic
16 attacks, and insomnia.

17
18 (17.) Plaintiff Fairchild is disabled, 62 years-old and suffers from a history of mental health
19 issues related to her civil rights being violated over the past five years, such as depression
20 and anxiety.

21
22 (18.) Defendants have engaged in wrongful conduct, that unless and until enjoined and
23 restrained by order of this court, will cause great and irreparable injury to Plaintiffs as an
24 injunction not being granted would result in both Plaintiffs' losing nearly all of the personal
25 property owned. Plaintiffs live in a hotel room, and nearly everything they own is inside of
26 their self-storage units, Spaces # 279 and # 287.

1 (19.) Plaintiffs' have no adequate remedy at law for the injuries being suffered or that are
2 planned on September 7, 2018 as the harm both Plaintiffs have experienced and dealt with
3 cannot be compensated by any amount of monetary damages awarded. It will be impossible
4 for Plaintiffs to determine the precise amount of damage that they will suffer if Defendants'
5 conduct is not restrained or Plaintiff will be forced to institute a multiplicity of lawsuits to
6 obtain adequate compensation for their injuries.

7
8 (20.) As a proximate result of Defendants' wrongful conduct, Plaintiffs' damages for their
9 injuries have amounted to the sum of \$ 100,000,000 (or such maximum damages allowed by
10 this court), including punitive damages for Defendants' intentional willful and wanton
11 conduct.

12
13 (21.) Plaintiffs will be further damaged in like manner so long as Defendants' conduct
14 continues. The full amount of this damage is not known to Plaintiffs at the present time.
15 Plaintiffs will therefore amend their civil rights complaint to state this amount when it
16 becomes known to them or on proof of the damages alleged.

17 **MEMORANDUM OF POINTS AND AUTHORITIES FOR TRO**

18 **I. INTRODUCTION**

19 Plaintiffs Arogant Hollywood and Alison Helen Fairchild are entitled to a temporary
20 restraining order to prevent Defendants and its agents from illegally selling and disposing of
21 Plaintiff's two self-storage units, Spaces # 279 and # 287 on September 7, 2018. Defendants
22 'conduct, behavior and actions directly violate California Business and Professions Code §§
23 21701-21710, the 14th Amendment of the United States Constitution, Title II of the Civil
24 Rights Act of 1964 and Title III of the American Disabilities Act of 1990.

25 Plaintiffs are entitled to a temporary restraining order to prevent Defendants from
26 illegally and unlawfully selling and disposing of Plaintiffs' personal property on September
27 7, 2018. Plaintiffs will suffer irreparable harm unless this Court enjoins Defendants.

1 **II. STATEMENT OF FACTS IN SUPPORT OF TRO & INJUNCTION**

2 On or about May 24, 2018 Plaintiff Alison Helen Fairchild and her personal driver
3 Chery Kaylor walked into Defendants' Public Storage located at 5548 Arrow Highway,
4 Montclair, California. Cheryl Kaylor rented the unit for Plaintiff Fairchild. Shortly
5 thereafter, Ms. Kaylor assisted Ms. Fairchild with moving a few things into her unit. All of
6 the contents within the 5548 Arrow Highway, Space # 279 belonged to only Plaintiffs
7 Arogant Hollywood and Alison Helen Fairchild. None of the contents stored within Space #
8 279 ever belonged to Cheryl Kaylor. At the time of said rental Cheryl Kaylor put down
9 Plaintiffs Arogant Hollywood and Alison Helen Fairchild as authorized persons on her rental
10 account with Public Storage. [Complaint at ¶ 28]

11 On or about June 11, 2018 Arogant Hollywood walked into Defendants' Public
12 Storage located at 5548 Arrow Highway, Montclair, CA. Plaintiff Hollywood was helped by
13 Defendants' employee Heidi. Heidi showed Plaintiff Hollywood requested to rent an
14 additional self-storage unit that was close to his current unit. Heidi showed Plaintiff
15 Hollywood a unit that was close to Space # 279. After seeing the self- storage unit, Plaintiff
16 Hollywood signed a rental contract for Space # 287. Plaintiff Hollywood requested that
17 Defendants' employee Heidi put down Alison Helen Fairchild as an authorized person on his
18 self-storage unit. [Complaint at ¶ 29]

19 On June 16, 2018 at approximately 3:48 p.m. Defendants' general manager Lauren
20 Scotvold accompanied by city of Montclair peace officer Rod Godoy approached Plaintiff
21 Hollywood and stated the following: "*So, you have three days, to vacate the unit. You can
only do it during office hours. Your lease has been terminated. You have to be off my
property by 5 o'clock today. If you are not you will be arrested.*" See *Hollywood Electronic
Recording transcript, p. 14.* Hollywood then responded: "You can't terminate my lease." To
25 which city of Montclair police department peace officer Rod Godoy responded: "They can."
26 Officer Godoy continued by saying to Plaintiff Hollywood the following: "*So it's been
noticed. So, to make clear. You can move your stuff out during business hours. Which
means you have three days to do it. So, you have until 5 o'clock today to move stuff out. By*

1 **5 o'clock you have to be off the premises. If you are not they're gonna arrest you.**

2 Hollywood Electronic Recording transcript, at p. 15. Plaintiff Hollywood then responded to
3 city of Montclair police department peace officer Rod Godoy by stating the following: **And**
4 **they'll get sued. You can't evict me like that. You have to go through legal process. I'm a**
5 **tenant.** See Hollywood Electronic Recording transcript, at p. 15. [Complaint at ¶ 43]

6 On June 16, 2018 Officer Godoy continued in his speech to support a prima facie case
7 for constitutional civil rights violations of Plaintiff Fairchild by asking Defendants' general
8 manager Lauren Scotvold. **"So, who's the one in the wheelchair?"** Lauren Scotvold then
9 answered: **"Oh, that's his girlfriend."** To which Officer Godoy Responded: **"Well, then she**
10 **has to get notice too."** Defendants' general manager then responded to Officer Godoy by
11 stating the following: **"She needs notice that she is not allowed on the property either."** See
12 Hollywood Electronic Recording transcript, at p. 18. [Complaint at ¶ 47]

13 On June 16, 2018 at approximately 5:14 p.m. city of Montclair police department
14 peace officers Jared Burns, and Rod Godoy returned to Defendants' Public Storage located
15 at 5548 Arrow Highway, Montclair, CA 91764. They were accompanied by newly arriving
16 officers Josh Garabedian, Sean Mackey and Jared Burns. At request of Defendants' general
17 manager Lauren Scotvold Officer Rod Godoy and his accompanying officers physically
18 removed Plaintiff Hollywood from Defendants' Montclair self-storage facility located at
19 5548 Arrow Highway, Montclair, CA. 91764. City of Montclair police department peace
20 officers also requested that Alison Helen Fairchild leave the premises, trespassed Plaintiff
21 Fairchild, and she therefore left on her own accord, and was not physically removed.
22 However, Plaintiff Fairchild was forced to leave her self-storage spaces' premises located at
23 5548 Arrow Highway, Montclair, California on June 16, 2018 at approximately 5:25 p.m.
24 This event triggered Alison Helen Fairchild's multiple sclerosis relapse symptoms and
25 Plaintiff Fairchild just days later became very depressed about her mistreatment by
26 Defendants and city of Montclair police department peace officers. It should be noted for
27 future allegations alleged in this lawsuit that the Public Storage tenant, Jasmine Brown,
28 Lauren Scotvold did not report any credible threats of violence or inappropriate behavior

1 made by Arogant Hollywood to the city of Montclair police department responding peace
2 officers on June 16, 2018. [Complaint at ¶ 49]

3 At approximately 9:15 a.m. Plaintiff Hollywood activated the record button on the
4 camera of his Samsung Galaxy Note 8 and entered Defendants' office. Once inside he
5 requested to speak to the district manager. At first the wrong district manager spoke to
6 Plaintiff Hollywood, but then a second district manager emerged which was a 20 something
7 year-old Caucasian male named Justin Miller. Justin Miller told Arogant Hollywood that he
8 had 72 hours to vacate his self-storage unit because of how aggressive he was with other
9 tenants. [Complaint at ¶ 52]

10 On June 18, 2018 at approximately 9:45 a.m. in the presence of city of Montclair
11 police department Sergeant Griffin Defendants' employee Justin Miller told Plaintiff
12 Hollywood that he had 72 hours to vacate his storage unit and handed him a card with a new
13 gate access code on it. [Complaint at ¶ 55]

14 On June 18, 2018 at approximately 1:25 p.m. Plaintiff Hollywood was inside of his
15 self-storage unit and therefore was not recording on his telephone or IPAD. All sudden
16 Defendants' employee Justin Miller walked by his storage and told Plaintiff Hollywood the
17 following: ***Nigger, if you do not move out of my units I will get a restraining order to
remove your black ass!*** This racial bias and animus made Plaintiff Hollywood very upset
18 however he did not respond as he knew that Defendants' employees were looking for a
19 reason to have him arrested and removed from the premises of his two self-storage units.
20 [Complaint at ¶ 57].

22 After leaving South Pasadena Plaintiffs and Cheryl Kaylor headed to Defendants'
23 Public Storage at 5548 Arrow Highway to place personal property retrieved at 2300 Purdue
24 Avenue into their Montclair self-storage units, Spaces # 279 and # 287. They all arrived at
25 approximately 8:20 p.m. Plaintiffs first tried their gate access codes and their access was
26 denied. Cheryl Kaylor next tried her gate access code and her access was also denied.
27 Plaintiff Hollywood was able to convince a Public Storage tenant to let him through the side
28 gate. Once Plaintiff Hollywood got upstairs to his units he noticed that both of his self-

storage units, Spaces # 287 and # 279 were overlocked by Defendants. There was also a copy of Defendants' unconstitutional three-day notice to vacate and lease termination notice taped to Plaintiffs' self-storage units. Plaintiff Hollywood managed to take a video and two photographs as evidence. See now *Appendix of Exhibits, Exhibit 3.* [Complaint at ¶ 74]

Feeling that they were now victorious in using a frivolous workplace violence restraining order to swiftly evict Arogant Hollywood from self-storage units, Defendants sent Plaintiff Hollywood a move -out receipt for his self-storage unit, Space # 287, on June 30, 2018. Just one day after Defendants' had their frivolous workplace violence petition granted by Judge Gilbert Ochoa. [Complaint at ¶ 79]

On August 10, 2018 Plaintiff Hollywood visited Defendant PS Orangeco's website, publicstorageauctions.com. Upon doing a check of upcoming auctions in Montclair, CA Plaintiff Hollywood discovered that both of his self-storage units, Spaces # 279 and # 287 were scheduled for auction on September 7, 2018. [Complaint at ¶ 89]

On August 14, 2018 Plaintiff Hollywood a copy of his declaration in opposition to lien sale, a screenshot of publicstorageauctions.com listing of his two self-storage units to: lhughes@publicstorage.com, rhavner@publicstorage.com, jrussell@publicstorage.com, ereyes@publicstorage.com, t.gustavson@publicstorage.com, bradleyhughes@gmail.com, bwhughes@acermalibu.com, and bwhughesjr@gmail.com. Plaintiff Hollywood's declaration in opposition to lien sale stated that Plaintiff opposed the lien sale because property owners Public Storage Corporation, Bradley Wayne Hughes, Bradley Wayne Hughes, and Tamara Gustavson Hughes never sent Plaintiff a preliminary lien notice pursuant to California Business & Professions Code § 21704. [Complaint at ¶ 90]

Plaintiff Hollywood's declaration in opposition to lien sale stated that Plaintiff opposed the lien sale because Public Storage Corporation, Bradley Wayne Hughes, Bradley Wayne Hughes, and Tamara Gustavson Hughes did not comply with California Business & Professions Code § 21705(b)(1)(A-E) before listing Plaintiff's personal self-storage unit online for a public auction currently scheduled for September 7, 2018 at 12:30 p.m. at 5548 Arrow Highway, Montclair, CA 91764. Plaintiff Hollywood's declaration in opposition to

lien sale stated that his declaration in opposition to lien sale was drafted in strict compliance with California Business & Professions Code 21705(b)(2). Plaintiff Hollywood used the drawing tool within his Office 365 Microsoft Word application to digitally sign the declaration in opposition to lien sale on his 4K touchscreen gaming laptop by drawing his signature with his fingers. A true and correct copy of Plaintiff Hollywood's email with declaration in opposition to lien sale PDF attachment is attached hereto, ***Appendix of Exhibits, Exhibit 14.*** A true and correct copy of Plaintiffs' Hollywood declaration in opposition to lien sale that was emailed to Public Storage executives and majority stockholders Ronald L. Havner, Joseph D. Russel, Edward John Reyes, Lily Yan Hughes, Tamara Gustavson Hughes and Bradley Wayne Hughes Jr. is attached hereto, ***Appendix of Exhibits, Exhibit 15.*** [Complaint at ¶ 91]

On the morning of August 18, 2018 Plaintiff Hollywood checked online at publicstorageauctions.com to see if Defendants had done the right thing by removing his two self-storage units, Spaces # 279 and # 287 from auction. Nope, not a chance, as Plaintiff Hollywood discovered that both of his self-storage units located at 5548 Arrow Highway, Montclair, California, 91764 were still up for auction. This time Plaintiff Hollywood took a screenshot of Defendants' auction advertisement of Plaintiffs' self-storage units. A true and correct copy of the screenshot snapped on Plaintiff's laptop on August 18, 2018 is attached hereto, ***Appendix of Exhibits, Exhibit 16.*** [Complaint at ¶ 92]

On August 20, 2018 Plaintiff Hollywood logged into his Public Storage self-storage account in Montclair, WA, Space # 287, Account # 50673620, by going to Defendants' website: publicstorage.com. Upon logging in Plaintiff Hollywood immediately noticed that Defendants had removed the payment tab, under my payments, and that the website stated: Your unit is at Auction. Please visit your property immediately. A true and correct copy of the screenshot snapped on Plaintiff's laptop on August 20, 2018 of Defendants' website showing that they had disabled the orange "***make a payment***" tab on Plaintiff Hollywood Public Storage is attached hereto, ***Appendix of Exhibits, Exhibit 18.*** [Complaint at ¶ 94]

1 On August 20, 2018 Plaintiff Hollywood received a telephone call from (909) 320-
2 5229. When he answered the telephone, the woman said how could she help Plaintiff.
3 Plaintiff Hollywood stated that she wanted to speak to the supervisor because Precious
4 refused to give out her last name. The female supervisor stated that it was at the discretion of
5 the clerk to give out their last name. Plaintiff Hollywood then asked for the female
6 supervisor's full name. The female supervisor stated that she did not feel comfortable giving
7 out her full name but would do so anyways. The female supervisor stated that he full name
8 was Karla Cuevas (pronounced *KWAY-vahss*). Plaintiff Hollywood asked Ms. Cuevas if her
9 court (Fontana Superior Court) was the court that had jurisdiction over city of Montclair
10 evictions and small claims, and Ms. Cuevas stated that her court handled both. Plaintiff
11 Hollywood asked Ms. Cuevas if she could search under his name to see if there were any
12 small claims actions filed against him. After searching the court's database Ms. Cuevas
13 stated that she found no records of any small claim actions filed against Arogant Hollywood.
14 Plaintiff Hollywood next asked Ms. Cuevas if she could check the court's database for any
15 pending unlawful detainer actions filed against him. Ms. Cuevas stated that she found one
16 for 2200 Ontario LLC. but nothing else. Plaintiff Hollywood next asked Ms. Cuevas if she
17 could check the small claims and unlawful detainer court database to see if there were any
18 lawsuits filed by Public Storage Corporation. Karla Cuevas stated that she did not find any
19 lawsuits for Public Storage in her database. [Complaint at ¶ 104].

20 On Thursday, August 30, 2018 (two days after Defendant Public Storage, Inc. was
21 personally served summons and complaint) Arogant Hollywood spoke to county of San
22 Bernardino court clerk's office supervisor Karla Cuevas. Ms. Cuevas told Plaintiff
23 Hollywood that as of August 30, 2018 there was no small claims or unlawful detainer actions
24 filed by Public Storage, Inc. See Hollywood Declaration at ¶]

25 This evidence supports the fact that Defendants have intentions and plans to skip
26 eviction proceedings and illegally sell and/or dispose of Plaintiffs' personal property while
27 bypassing California Business & Professions Code §§ 21703-21710.

1 **III. THE APPLICATION OF LEGAL STANDARDS, ARGUMENT &**
2 **AUTHORITY**

3 A preliminary injunction is intended to preserve the status quo and prevent irreparable
4 injury to the plaintiff during the course of litigation.

5 **A. Standards for Granting Relief**

6 The courts have traditionally considered four factors in determining whether a
7 preliminary injunction should be granted:

- 8 (i) The probability of plaintiff's success on the merits;
9 (ii) Irreparable nature of harm to the plaintiff;
10 (iii) The balance of hardships between the parties; and
11 (iv) Where appropriate, as in civil rights cases, the public interest;

12 Traditional analysis has required the movant to demonstrate a substantial likelihood of
13 success on the merits, a substantial threat he/she will suffer irreparable harm unless the
14 preliminary injunction is granted, that the threatened injury if the injunctive relief is denied
15 outweighs the possible harm to Defendants if relief is granted, and that issuance of injunctive
16 relief will serve the public interest. Indeed, this is still the law being applied by many courts.
17 The Second and Ninth Circuits, however, have spearheaded a rearticulation of the standards
18 for obtaining preliminary injunctions.

19 The revised standards for granting a preliminary injunction in the Ninth Circuit's
20 sister court the Second Circuit are: a showing of (a) irreparable harm and (b) either (1)
21 likelihood of success on the merits or (2) sufficiently serious questions going to the merits to
22 make them a fair ground for litigation and a balance of hardships tipping decidedly toward
23 the party requesting the preliminary relief. The rule thus recognizes two tests; as we have
24 previously observed however, “[b]oth require a showing of irreparable harm. “Under the first
25 test, the movant may succeed if he shows irreparable harm, plus a likelihood success on the
26 merits. Under the second test, the movant may succeed if he shows irreparable harm, plus
27 sufficiently serious questions going to the merits to make them a fair ground for litigation
28 and a balance of hardship tipping decidedly toward the movant.

1 The Second Circuit has further held that “the more lenient standard of “serious
2 questions going to the merits and a balance of hardships, instead of the likelihood of success
3 on the merits’ standard [will not be applied] when the preliminary injunction is sought by a
4 government agency,” *Resolution Trust Corp. v. Elman*, or “where the moving party seeks to
5 stay government action taken in the public interest pursuant to a statutory regulatory
6 scheme... “*Plaza Health Laboratories, Inc. v. Perales*.

7 The Ninth Circuit’s test is articulated as follows:

8 In order to obtain a preliminary injunction, a party must demonstrate either (1) a likelihood
9 of success on the merits and a possibility of irreparable injury, or (2) the existence of serious
10 questions on the merits and a balance of hardships tipping in its favor. [citation omitted]
11 These two legal standards are not distinct, but rather extremes of a single continuum. *Id.* In
12 cases where the public interest is involved, the district court must also examine whether the
13 public interest favors the plaintiff. Nonetheless, even in the Ninth Circuit, “[a] showing of
14 irreparable harm is a prerequisite for the issuance of a preliminary injunction in any case.”
15 *Earth Island Institute v. Mosbacher*.

16 The movant, therefore, whatever nuance is interjected into the various tests supplied
17 by the circuits, has a heavy burden of showing some likelihood of success on the merits and
18 of demonstrating irreparable harm.

19 To succeed on a motion for a preliminary injunction, a plaintiff must demonstrate that
20 it meets four criteria. *Winter v. Natural Res. Def. Council*, 555 U.S. 7, 20 (2008). The
21 preliminary injunction must be in the public interest, and likely prevent irreparable harm; the
22 balance of equities must tip in plaintiff’s favor; and plaintiff must be likely to succeed on the
23 merits. *Id.* Plaintiffs have shown a likelihood of success on the merits based on all said
24 allegations made against Defendants. Plaintiffs have also shown that public policy favors an
25 injunction to preserve the status quo, and the public, present Public Storage and future Public
26 Storage tenants would benefit from both a Temporary Restraining Order and a permanent
27 injunction.

1 Plaintiffs Arogant Hollywood and Alison Helen Fairchild are highly likely to succeed
2 on the merits of their civil rights lawsuit filed against Defendants. Defendants have
3 threatened and stated that they would initiate state court eviction proceedings in June 2018,
4 yet as of September 1, 2018 no state court eviction proceedings have been initiated by
5 Defendants. [Hollywood Declaration at ¶] Defendants have blocked the gate code access of
6 Plaintiffs and overlocked their unit while preventing Plaintiffs from making a payment for
7 their self-storage units, Spaces # 279 and # 287 online or at any Public Storage location.
8 Defendants initiated a frivolous workplace violence restraining order based on perjurious
9 statements to prevent Plaintiff Hollywood from entering the property of 5548 Arrow
10 Highway, Montclair, CA. Defendants have ignored a timely served declaration in opposition
11 to lien sale. Lastly Defendants have conspired and planned to illegally sell and/or dispose of
12 Plaintiffs' personal property on September 7, 2018. [Exhibit] Defendants' actions not only
13 are violations of the United States constitution but are tortious in regard to California state
14 laws against conversion and **AB 1108 Self-service storage facilities. (2017-2018)**.

15 **B. Defendants' Are Deliberately Violating Plaintiffs' 14th Amendment Rights**

16 The United States Constitution Amendment XIV, Section 1 provides:
17 All persons born or naturalized in the United States, and subject to the jurisdiction thereof,
18 are citizens of the United States and of the state wherein they reside. No state shall make or
19 enforce any law which shall abridge the privileges and immunities of citizens of the United
20 States, nor shall any state deprive any person of life, liberty, or property without due process
21 of law, nor deny any person within jurisdiction the equal protections of the laws.

22 Defendants are violating Plaintiffs' civil rights by planning to dispose of Plaintiffs'
23 personal property on September 7, 2018. The reason why no state court eviction proceedings
24 have been initiated by Defendants as of August 30, 2018, is because Defendants figured state
25 court eviction proceedings would be moot and unneeded after they illegally disposed of
26 Plaintiffs' personal property on September 7, 2018. Defendants' actions in blocking
27 Plaintiffs' gate access code, overlocking both of Plaintiffs' self-storage unit, Spaces # 279
28 and # 287, and even trespassing them from their facility should be alarming to this Court. As

1 their actions violated the United States Constitution as well as AB-1108 Self-service storage
2 facilities. (2017-2018). Also, terminating Plaintiffs' lease and stating that they would initiate
3 state court eviction proceedings did not give Defendants the right to deny public
4 accommodations, refuse to accept rent, block Plaintiffs' gate code access, overlock their self-
5 storage units and illegally plan to sell Plaintiffs' personal property on September 7, 2018.

6 **C. Defendants Are Deliberately Violating AB-1108 Self-service storage facilities.
(2017-2018).**

7 AB 1108 provides:

8 (1) Existing law, the California Self-Service Storage Facility Act, specifies remedies
9 and procedures for self-service storage facility owners when occupants are delinquent in
10 paying rent or other charges. Under existing law, if rent or other charges due from an
11 occupant remain unpaid for 14 consecutive days, an owner may terminate the right of the
12 occupant to the use of the storage space at a self-service storage facility by sending a
13 preliminary lien notice by certified mail to the occupant's last known address, as defined to
14 mean the address provided by the occupant, as specified.

15 This bill, until January 1, 2021, would authorize the notice to be sent by electronic
16 mail and would revise the definition of last known address to include a mailing address and
17 email address provided by the occupant, as specified, and make conforming changes.

18 (2) Existing law deems a lien to attach if the notice has been sent and the total sum due has
19 not been paid within 14 days of the termination date specified in the preliminary lien notice
20 and authorizes the owner to deny the occupant access to the space, enter the space, and
21 remove property to a place of safekeeping. Existing law requires the owner to send to the
22 occupant's last known address a notice of lien sale and a blank declaration in opposition to
23 the lien sale.

24 This bill, until January 1, 2021, would deem the lien to attach if the notice has been
25 sent and the total sum due has not been paid by the specified termination date.

26 (3) Existing law specifies procedures for an owner to enforce the lien by the sale of the
27 stored property. These procedures require an advertisement of the sale to be published for 2
28 consecutive weeks in a newspaper of general circulation in the judicial district where the sale

1 is to be held. They also require the sale to be conducted in a commercially reasonable
2 manner.

3 Defendants violated California Business & Professions Code § 21703 by never
4 sending either Plaintiff a notice that Plaintiffs' right to use their self-storage unit would be
5 terminated.

6 Defendants violated California Business & Professions § 21705 by denying Plaintiffs'
7 access to their self-storage units, and overlocking Plaintiffs' unit on June 21, 2018, when at
8 the time Plaintiffs were paid in full on both of their self-storage units, Spaces # 279 and #
9 287. Defendants also violated Cal Bus Prof § 21703 by never mailing a copy of preliminary
10 lien notice to either Plaintiff as was required by California state law.

11 Defendants violated California Business & Professions § 21707 by listing Plaintiffs'
12 personal property on Defendant PS Orangeco's website publicstorageauctions.com since
13 early August 2018., without following the procedures required by Cal Bus Prof § 21707.

14 Defendants have no regards for the civil rights of United States citizens and the laws of
15 the state of California. Defendants must be enjoined from not selling Plaintiffs' personal
16 property on September 7, 2018.

17 **D. Defendants Violated the American Disabilities Act of 1990, and Plaintiff
18 Fairchild is Therefore, Likely to Prevail on the Merits of her Claim**

19 The American Disabilities Act of 1990 is so important to the federal judicial system
20 that it was implemented into the local court rules of central district court, see generally L.R.
21 16-4.1. This court must enjoin Defendants from further discriminating against a disabled
22 woman who has done absolutely no wrongdoing to Defendants.

23 Defendants do not care about handicapped United States citizens and over the years
24 have done little to nothing to improve the conditions of its facilities to accommodate citizens
25 protected under the American Disabilities Act of 1990. In *Javier Revelez v. Public Storage*
26 (2010), et al, 2:09-cv-05774-RSW-RZ, Defendants were sued for violations of the American
27 Disabilities Act of 1990 and then agreed to a stipulation to dismiss the case with prejudice on
28 December 15, 2010 Judge Ronald Lew ordered that the case be dismissed.

1 In *Jose Vasquez, et al v. Public Storage (2010), et al, 2:09-cv-05774-RSW-RZ.*

2 Defendants were sued in a class action lawsuit for civil rights violations of the American
3 Disabilities Act of 1990. On December 14, 2018 Judge Dale Fischer dismissed the case with
4 prejudice after Defendants agreed to a stipulation with Plaintiff.

5 In *Chris Langer v. Public Storage, et al (2012), 2:12-cv-06335-PA-MAN* Defendants
6 were sued for civil rights violations of the American Disabilities Act of 1990. On November
7 16, 2012 Judge Perey Anderson dismissed the case with prejudice after Defendants agreed to
8 a settlement with Plaintiff.

9 Just in October 2017, in *Carmen John Perri v. Public Storage Properties XIV, Ltd., et*
10 *al, 8:17-cv-01874-CJC-DFM.* Defendants were sued for violations of American Disabilities
11 Act of 1990.

12 Plaintiff Fairchild is a disabled person protected under the laws of Title III of the
13 American Disabilities Act of 1990. Plaintiff Fairchild alleges that she was discriminated
14 against by Defendants. Plaintiff Fairchild alleges that Defendants intentionally denied
15 Plaintiff Fairchild access to her self-storage units. Plaintiff Fairchild alleges that Defendants
16 have deliberately denied her public accommodations into their facility 5548 Arrow Highway,
17 Montclair, CA 91764 since June 16, 2018. Plaintiff Fairchild believes that if this Court does
18 not issue an injunction and grant Plaintiffs' TRO request, Defendants will illegal sell
19 Plaintiffs' personal property at an illegally planned public auction on September 7, 2018.
20 Plaintiff Fairchild believes that based on the history of Defendants being sued numerous
21 times for ADA violations, Defendants will dispose of her personal property on September 7,
22 2018.

23 Because Plaintiff Fairchild can prove that she was discriminated against by
24 Defendants, denied reasonable accommodations and ridiculed by Defendants in June 2018,
25 Plaintiff Fairchild is likely to be meritorious on the claims of her civil rights complaint.

26 **E. Defendants Violated Title II of Civil Rights Act of 1964, and Plaintiff
27 Hollywood Is Therefore, Likely to Prevail on the Merits of his Claim**

28 Section 1981, as amended by the Civil Rights Act of 1991, specifically provides that "the
term make and enforce contracts" includes the making, performance, modification, and
termination of contracts, and the enjoyment of all benefits, privileges, terms, and conditions of

1 the contractual relationship.” ***Id.*** § 1981 (b) (emphasis added). This language provides that once
 2 a contractual relationship exists, a benefit or privilege of that relationship may not be withheld
 3 based on the race of one party to the contract even if the benefit or consideration was not the
 4 consideration for the contract. See *Cf. Morris v. Office Max.* 89 F.3d 411, 414 (7th Cir. 1996).

5 Defendants terminated the lease of Plaintiff Hollywood based on his race. Defendants
 6 used racial slurs against Plaintiff and initiated frivolous workplace violence restraining order
 7 proceedings to further discriminate against Plaintiff and interfere with Plaintiffs’
 8 constitutional 14th Amendment rights. Defendants have ignored Plaintiff Hollywood’s
 9 declaration in opposition to lien sell originally served upon them on August 14, 2018, and
 10 then served upon them personally at the same time of service of summons and complaint on
 11 August 28, 2018. Defendants have blocked Plaintiff Hollywood from not only making a
 12 payment for his two self-storage online but at any Public Storage self-storage location in the
 13 United States, see Complaint at ¶ 98.

14 Defendants’ attorney Ha Nguyen stated the following in Defendants’ frivolous
 15 workplace violence restraining order petition: ***Respondent has been served with a 2-day
 16 eviction notice from Public Storage unit. Respondent has failed to move out of his unit.
 17 Petitioner is commencing state eviction action against Respondent. Petitioner requests that
 18 Respondent be accompanied by the police when he removes his items from storage.*** See
 19 Document 11, Filed 8/27/2018 at page 41 of 56 Page ID #: 298.

20 As of August 30, 2018, it has been at least sixty-four calendar days since Ha Nguyen
 21 told a San Bernardino county court in Defendants’ petition that they were commencing state
 22 court eviction proceedings. However, Defendants never commenced state court eviction
 23 proceedings because they had plans to dispose of Plaintiffs’ personal property by refusing to
 24 accept payment, which forced Plaintiffs’ in lien status, and gave Defendants the go ahead to
 25 illegally sell and dispose of Plaintiffs’ property on September 7, 2018.

26 Plaintiff Hollywood is likely to prevail on the merits of his claims because he can
 27 prove that Defendants discriminated against him based on his race, have denied Plaintiff
 28 Hollywood reasonable accommodations, converted his personal property, blocked his access
 to his self-storage facility, overlocked his two self-storage units even when Plaintiff

Hollywood was not in default of his rental payments to Defendants, initiated frivolous and groundless workplace violence restraining order proceedings to prevent Plaintiff from going to his self-storage units, and illegally listed his two self-storage units on publicstorageauctions.com while at the same time deliberately failing to initiate any type of state court proceedings to remove Plaintiff Hollywood and to cease public auction proceedings on September 7, 2018.

F. Plaintiffs Will Suffer Irreparable Harm if this Court Does Not Enjoin Defendants from Going Forth with Unconstitutional and Illegally Planned Public Auction on September 7, 2018

Plaintiffs will suffer irreparable harm because nearly everything they own is located inside of their two self-storage units. Plaintiff Hollywood has four file cabinets of law papers, some of which he will need for upcoming lawsuits to be filed in this court. Plaintiff Fairchild has many family memories, a record collection, expensive clothes and perfumes located inside of her two self-storage units. The storage units are 10 by 15 and 10 by 20 and are filled to their maximum capacity. Plaintiffs needed a twenty or twenty-two-foot U-HAUL truck to move all of their personal property onto Defendants' property.

Defendants have told a state court that they were initiated state court evictions in June 2018. Yet, it is now September 2018, and Defendants have never initiated any type of state court proceedings because they had plans to illegally sell and dispose of Plaintiffs' personal property on September 7, 2018 as advertised on their website publicstorageauctions.com. Defendants have violated the civil rights of many United States citizens many times over in the past, and in this current case Defendants are violating a California Senate bill as well as the 14th amendment of the United States constitution. Defendants have been sued many times over just alone in the Central District court, not to mention many other federal district courts across the nation regarding similar civil rights violations alleged in Plaintiffs' complaint. Accordingly, this court should enjoin Defendants from conducting their illegally planned public auction of Plaintiffs' personal property on September 7, 2018.

1 **G. Even After the Filing and Service of This Civil Rights Complaint Defendants
2 Continue their Conversion of Plaintiffs' Personal Property, and Plaintiffs Are
3 Therefore, Likely to Prevail on their Claim for Conversion**

4 Defendant Public Storage, Inc. was served a copy of the summons and complaint on
5 August 28, 2018 at their corporate headquarters in Glendale, CA. Plaintiffs' legal process
6 server David Luce also separately served Defendants' attorney Tammy Lynn Gardner (#
7 315253) a copy of Plaintiffs' declaration in opposition to lien sale for Spaces # 279 and #
8 287 that was originally served on Defendants on August 14, 2018. Nevertheless, as of
9 September 2, 2018 Plaintiffs' two self-storage units are still listed on Defendants' website
10 publicstorageauctions.com for a public sale scheduled for September 7, 2018. Defendants
11 have locked Plaintiffs' out of both of their self-storage units, and as of September 2, 2018
12 continued to block Plaintiffs from making a payment online or at any Public Storage self-
13 storage location in the United States.

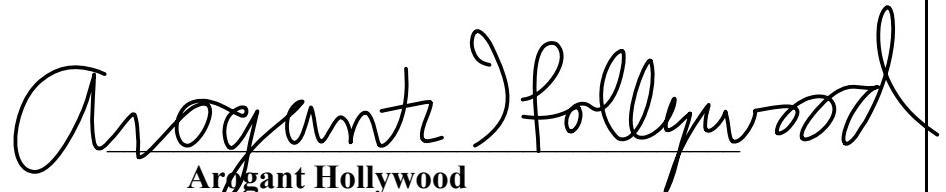
14 Defendants have converted Plaintiffs' property by knowingly and illegally taking
15 possession of it and planning to dispose of it on September 7, 2018 without due process of
16 law, and against AB-1108 Self-service facilities. (2017-2018).

17 **IV. CONCLUSION**

18 For the above stated reasons, Plaintiffs' TRO and preliminary injunction should be granted
19 and an order to show cause should be issued.

1 **DATED: September 2, 2018**

2 Respectfully Submitted,

3
4
5 
6 Argant Hollywood
7 Plaintiff in Federal Pro-Se Litigation

8
9
10 
11 Alison Helen Fairchild
12 Plaintiff in Federal Pro-Se Litigation